FILED

THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

2022 APR -5 A II: 07

UNITED STATES OF AMERICA

v.

ALEKSEI YURIEVICH BURKOV, a/k/a "Aleksey Yurevich Burkov"

Defendant.

Criminal Action No. 1:15-cr-00245-TSE-1

MOTION TO INTERVENE AND UNSEAL JUDICIAL RECORDS

By and through undersigned counsel, Forbes Media LLC ("Forbes") and its Associate Editor Thomas Brewster ("Brewster") (collectively, "Proposed Intervenors") respectfully move this Court for leave to intervene in this matter for the limited purpose of seeking an order to unseal judicial records in this case that are presumptively public pursuant to the First Amendment and the common law.

Specifically, and as described more fully in the accompanying Memorandum of Law,
Proposed Intervenors seek access to sealed Docket Entries 8, 9, 10, 11, 12, 17, 18, 23, 35, and 43
(the "Sealed Records").1

WHEREFORE, for the reasons stated herein and in the accompanying Memorandum of Law, Proposed Intervenors respectfully request that the Court enter an order granting Proposed Intervenors leave to intervene and unseal the Sealed Records.

Date: April 5, 2022

¹ Proposed Intervenors do not seek access to the Defendant's presentence report. See D.E. 45, 46.

Respectfully submitted,

/s/ Lin Weeks

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Counsel for Forbes Media LLC and Thomas Brewster

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April, 2022, the foregoing MOTION TO

INTERVENE AND UNSEAL JUDICIAL RECORDS will be filed with the Clerk of Court and served on counsel for the following via email and FedEx:

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